

Message

From: Paisley-Jones, Claire [Paisley-Jones.Claire@epa.gov]
Sent: 1/16/2020 10:01:17 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]
CC: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!!
Attachments: 24c 11519 (002) ss (cpJ).docx

Here's what I have so far.

As I mentioned, Andrea is putting together the citations for besides the Q&A that this statement occurs "a state can document that a federally registered product [...] cannot be applied without causing unacceptable risk to human health or the environment". We will forward that to you as soon as we can.

Claire

From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Thursday, January 16, 2020 3:27 PM
To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: FW: Majorly Edited 24(c) Memo -- SARAH next steps!!

Claire

Here is the revised paper. I will start looking it over – if you can too that would be great. thanks

Michael L. Goodis, P.E.
Director, Registration Division (RD)
Office of Pesticide Programs (OPP)

Phone 703-308-8157
Room S7623

From: Stillman, Sarah <Stillman.Sarah@epa.gov>
Sent: Thursday, January 16, 2020 3:02 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!!

+ Melissa

Alex,

Please find attached the revised section 24(c) memo.

I thought the purpose of this memo was to recommend we start disapproving pending/incoming section 24(c) requests so I added a "proposed next steps" section back in.

Let me know what you think.

Sarah

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Wednesday, January 15, 2020 6:21 PM

To: Stillman, Sarah <Stillman.Sarah@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>

Subject: Majorly Edited 24(c) Memo -- SARAH next steps!!

Sarah,

I have a much different idea about how to present this to the Administrator. I think you'll be able to understand my approach when you see all the edits and deletions I made. I ran out of time to continue working on the "implementation" section (the regs, what we would do, which states are up next, what is the timing?). Can you work on this on Thursday when I'm on travel and get it back to me so I can work more on it on Friday?

I really think we talk too much about dicamba here. While that may have led to increased 24(c)'s, the "misuse" as I call it has been going on for a long time and it is time for us to correct ourselves.

Give it a shot along my new structure and let's talk Friday.

Thanks.